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TS #175252

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Sean Michael Harrum,

Debtor.

Case No. 2:20-bk-00322-PS

Chapter 13

U.S. Bank National Association,

Movant,

vs.

Sean Michael Harrum, Debtor; and Russell
Brown, Ch 13 Trustee,

Respondents.

**STIPULATION TO CONTINUE
HEARING ON MOTION FOR RELIEF
FROM AUTOMATIC STAY**

Re: Real Property Located at
8520 W Palm Ln, Unit 1004
Phoenix, AZ 85037

Current Hearing

Date: October 29, 2024

Time: 11:30 AM

U.S. Bank National Association (“Movant”), by and through its counsel of record, and
Sean Michael Harrum (“Debtor”), by and through their counsel of record hereby submit the
following:

U.S. Bank National Association is seeking to continue the hearing as the servicer needs
to amend the Proof of Claim, filed on March 6, 2020, to include post-petition arrears for

1 September 1, 2023, and October 1, 2023, pursuant to the Stipulated Order Confirming Third
2 Modified Chapter 13 Plan. After the Proof of Claim is Amended, an updated payment history
3 will allow us to determine if Debtor is current or if there continue to be past due payments. In
4 addition, the Order Setting Preliminary Hearing on Motion for Relief From The Automatic Stay
5 and Establishing Procedures For Presentation Of Evidence At Final Hearing was not timely
6 served on the Respondents.

7 IT IS HEREBY STIPULATED that the hearing on Movant's Motion for Relief from the
8 Automatic Stay hearing ("Motion") be continued for a minimum of 60 days from the current
9 hearing date to allow time for the Amended Proof of Claim to be completed and the hearing to
10 be properly noticed.

11
12 **RESPECTFULLY SUBMITTED** this 28th day of October, 2024.

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14
15 /s/ Christina Harper
16 Christina Harper, Esq.
17 THE MORTGAGE LAW FIRM, PC
18 *Attorney for Movant*

19
20
21 /s/ Jacob R. Goodman
22 Jacob R. Goodman
23 GOODMAN LAW PRACTICE PLC
24 *Attorney for Debtors*

1 Original filed by ECF and COPIES
2 mailed this 28th day of October, 2024, to:

3
4 Debtor
5 Sean Michael Harrum
6 8520 W. Palm Lane
7 Unit 1004
8 Phoenix, Az 85037

9 Debtor's Counsel
10 Thomas Adams Mcavity
11 Phoenix Fresh Start Bankruptcy Attorneys
12 4131 Main Street
13 Skokie, Il 60076-2780

14 Trustee
15 Russell Brown
16 Chapter 13 Trustee
17 3838 N Central Ave
18 Ste 800
19 Phoenix, Az 85012-1965

20 U.S. Trustee
21 U.S. Trustee
22 Office Of The U.S. Trustee
23 230 North First Avenue
24 Suite 204
25 Phoenix, Az 85003

26
27 /s/ Izabelle Gutierrez
28 Izabelle Gutierrez